

19 September 2016

Department of Environment, Land, Water and Planning
Victoria State Government
8 Nicholson St
EAST MELBOURNE VIC 3002

To whom it may concern,

RE: BETTER APARTMENTS DRAFT DESIGN STANDARDS – [REDACTED] DOCUMENT RESPONSE

[REDACTED] welcomes the opportunity to comment and provide feedback on the *Better Apartment Draft Design Standards* (2016).

[REDACTED] is a multi-disciplinary consultancy that provides integrated services in waste and traffic engineering; transport planning; and road safety auditing. We have significant experience across a variety of projects in Victoria, including both regional and metropolitan areas. [REDACTED] provides expert advice to clients in local government, state government and the private sector, and regularly engages with industry innovators, councils and government organisations to develop best practice solutions in both the fields of traffic and waste engineering.

The S [REDACTED] waste engineering team have significant experience across a broad range of projects from the development of waste planning guidelines to the integration of best practice waste design within large scale residential and commercial developments. The team build on knowledge gained from working within local government, private industry and product manufacture, to deliver tailored, effective waste engineering solutions.

Please find enclosed a copy of [REDACTED]'s comments regarding the *Better Apartments Draft Design Standards* (2016). The comments respond to the waste component of the document, providing items for consideration. These suggestions have been made from an industry perspective from our experience delivering waste management plans and authoring Council waste management guidelines, along with our work engaging industry innovators. Throughout our experience it has been recognized that there needs to be a greater focus on improved waste management, and adequate provisions for the segregation of waste streams without contamination.

The item we believe may have the most significant impact is the recommendation for a suitably qualified waste engineer to undertake waste management design and planning, which will significantly aid in the provision/s of best practice waste management systems and level of service for residents within Victorian developments. In [REDACTED]'s experience, developments which proceed without a qualified waste engineer often fail in providing a high level of service for residents.

Thank you for the opportunity to provide feedback. We look forward to our continued involvement in the development of the design standards.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



The following contains [REDACTED] comments regarding the content of the "Waste" section of the *Better Apartment Draft Design Standards* (2016). The content of the *Better Apartment Draft Design Standards* is quoted below, with S [REDACTED] comments indented and notated in orange.

Waste

The standard seeks to ensure that waste management facilities are well designed, and enable residents to manage their own waste easily.

Consider adding text such as "residents should be able to dispose of recyclable and organic waste (where appropriate) as easily as garbage waste" to encourage separation of waste being available at all disposal points.

Standard

The development should include dedicated areas for:

- Bin and recycling enclosures that are adequate in size, durable, waterproof and blend in with the development.
 - *Consider the term "garbage and recycling bin enclosures..." in place of "bin and recycling..." for clarity.*
- Bin and recycling enclosures that are located for convenient access by residents.
 - *Consider the term "garbage and recycling bin enclosures..." in place of "bin and recycling..." for clarity; and*
 - *Consider the term "drop off points" in place of enclosures to capture chutes and similar technology.*
- Collection, separation and storage of general waste and recyclables, including where appropriate opportunities for on-site management of food waste through composting.
 - *Consider the term "garbage and recycling" in place of "general waste and recyclables" for clarity;*
 - *Identifying "composting" as the only organics management systems may be limiting, suggest potentially mentioning dehydrators, digesters, and other appropriate alternatives. Several emerging technologies in this space are looking very promising for the management of organic waste for residential uses; and*
 - *Consider adding "hard waste" as a recommended stream.*
- Collection, storage and reuse of garden waste, including where appropriate opportunities for on-site treatment.
 - *Consider the term "recyclables, garbage and food waste" in place of "general waste and recyclables" for clarity;*
- Adequate circulation area for waste collection vehicles.
 - *S [REDACTED] agrees*
- Adequate internal storage space within each dwelling to enable the separation of recyclables, residual waste and where appropriate food waste.
 - *Consider the term "recyclables, garbage" in place of "recyclables, residual waste" for clarity;*
- *Other items for potential consideration:*
 - *Consider providing additional bullet point which recommends twin chute systems (garbage and recycling) for the disposal of waste within developments which require an elevator under the Building Code of Australia. This has a large impact on resident quality of life within all developments.*
 - *Consider mentioning the use of charity bins can be implemented to divert clothing and homewares in good condition. Charities collect these free of charge. [REDACTED] notes this is ideal in developments exceeding 50 dwellings;*

Waste management systems and facilities should:

- Protect public health and amenity of occupants and adjoining premises from the impacts of odour, noise and waste collection vehicle movements.
 - [REDACTED] agrees
- Be maintained in accordance with a Waste Management Plan approved by the responsible authority.
 - *In the aim of ensuring a high quality of solution and system for residents, consider adding that Waste Management Plans should be prepared by a qualified waste engineer,*

Applying the Standard

Apartment buildings should provide dedicated areas for bin and recycling enclosures, and areas for collection, separation and storage of waste. This includes providing adequate spaces within an apartment for separated storage of waste, recyclables and food waste.

Consider adding text such as "residents should be able to dispose of recyclable and organic waste as easily as garbage waste" to encourage separation of waste being available at all disposal points.

Providing spaces and facilities for composting of appropriate types of food and garden waste is also encouraged, although this will partly be influenced by whether the composted material can be used on-site.

Waste management issues will be resolved between the permit applicant and the responsible authority through the preparation of a waste management plan.

In the aim of ensuring a high quality of solution and system for residents, consider adding that Waste Management Plans should be prepared by a qualified waste engineer,

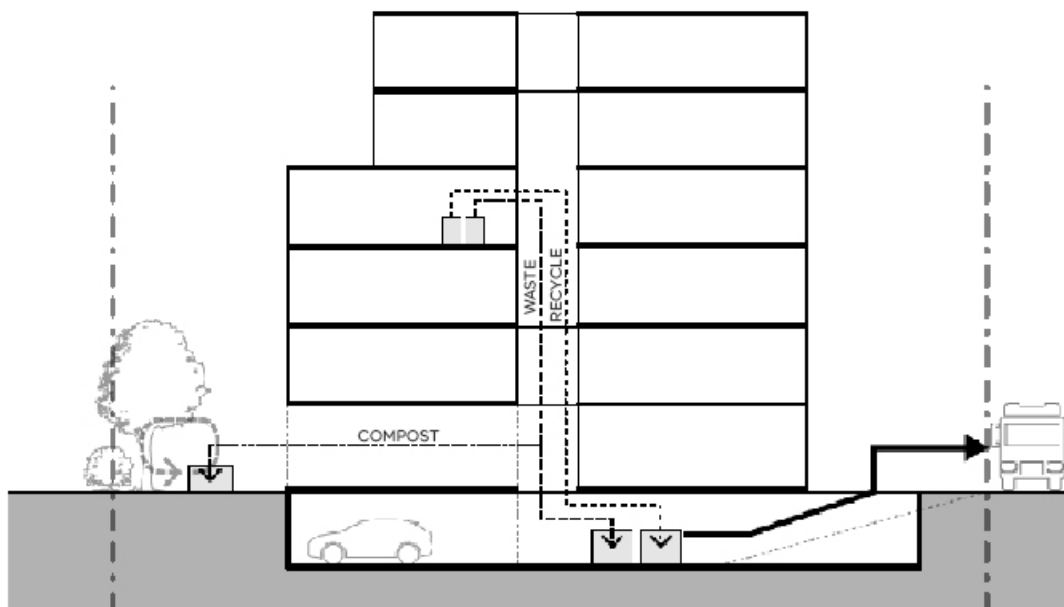


Image: consider reworking to indicate twin chute (garbage and recycling) systems as there are the most common and appropriate for the majority of high-rise developments.

Consider additional term to glossary as follows:

- **Waste** – refers to garbage, commingled recycling, garden and organic waste.